

REMARKS

The Examiner's Office Action dated September 30, 2003, has been received and its contents reviewed. For the reasons explained in detail below, the Applicants respectfully request reconsideration and withdrawal of the outstanding objections and rejections of record.

With regard to the Examiner's rejections based upon the Bohlen et al. article (hereafter, "Bohlen"), under § 102 relative to claims 1, 2, 4-6, 8, and 9 and under § 103 relative to claims 3 and 7, it is believed that, if the same open-minded consideration is given to the following comments as was given to those presented in applicants' preceding response, then the Examiner will recognize that these rejections should also be withdrawn.

As pointed out in the preceding response, the presently claimed invention requires "a mask substrate on which a plurality of masks with apertures are formed" as in claim 1 or "a single mask substrate on which a plurality of the masks are formed" as in claim 9 in an electron beam source proximity exposure apparatus, the plurality of masks being identical as set forth in claims 2, 7 & amended claim 9. Furthermore, claim 1 also recites a "mask moving mechanism.

However, it can be seen from a review of the Bolen reference that a stationary mask support is provided (Fig. 2), and no mechanism for moving the mask exists. The portions of the Bolen reference cited by the Examiner as disclosing a mask movement mechanism (first full paragraph, page 3 of his Action) not only do not disclose movement of the mask, but teach to the contrary. That is, the exposure beam angle is shifted to shift the position of the image produced by the masks (page 212, right column "Pattern Positioning" section, first full paragraph page 214, and Fig. 11), so that no reason for providing a mask moving mechanism exists. Furthermore, contrary to the Examiner's assertion, it would not be obvious to modify the teachings of Bolen to use a plurality of identical masks because such would be directly contrary to the disclose complementary mask concept of this reference, whereby a the image of a plurality of complementary patterns are "superimposed" to "yield the desired pattern" (see, paragraph spanning the columns of page 212 and Fig. 5). Still further, both of these factors are combined by Bolen so that "both complementary masks are printed on adjacent chips at one table position. Given these teachings of Bolen, it is not understood how or why

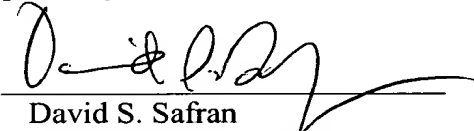
one would provide multiple masks that are identical instead of being complementary, and why a mask movement mechanism would be provided when such is unnecessary and would not provide any added benefit in the context of the Bolen disclosure.

Accordingly, Bolen is neither anticipative nor suggestive of the present invention. As a result, withdrawal of the rejections based on the Bolen reference are in order and are now requested.

In view of the above arguments, each of the pending claims 1-9 are deemed to be in condition for allowance. However, should the Examiner find some issue to remain unresolved, or should any new issues arise, which could be eliminated through discussions with Applicants' representative, then the Examiner is invited to contact the undersigned by telephone in order that the further prosecution of this application can thereby be expedited.

Respectfully submitted,

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